

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNION DEL PUEBLO ENTERO, et al.,

Plaintiffs,

vs.

NO. 5:21-cv-844-XR

GREGORY W. ABBOTT, et al.,

Defendants.

OCA-GREATER HOUSTON, et al.,

Plaintiffs,

vs.

NO. 1:21-cv-780-XR

JOHN SCOTT, et al.,

Defendants.

HOUSTON JUSTICE, et al.

Plaintiffs,

vs.

NO. 5:21-cv-848-XR

GREGORY WAYNE ABBOTT, et al.

Defendants.

LULAC TEXAS, et al.

Plaintiffs,

vs.

NO. 1:21-cv-786-XR

JOHN SCOTT, et al.

Defendants.

MI FAMILIA VOTA, et al.

Plaintiffs,

vs.

NO. 5:21-cv-0920-XR

GREG ABBOTT, et al.

Defendants.

UNITED STATES OF AMERICA,

Plaintiff,

vs.

NO. 5:21-cv-1085-XR

THE STATE OF TEXAS, et al.

Defendants.

**HAUL AND MFV PLAINTIFFS' RULE 26 EXHIBIT LIST AND DEPOSITION
DESIGNATIONS**

Pursuant to Federal Rule of Civil Procedure 26(a)(3) and this Court's March 30, 2023 Scheduling Order (Dkt. 579) the HAUL Plaintiffs and the MFV Plaintiffs respectfully submit the attached list of exhibits and deposition designations, Exhibit A. The HAUL Plaintiffs and MFV Plaintiffs also reserve the right to introduce any exhibit that appears on any other party's exhibit list, and further reserve the right to amend their disclosures to include exhibits that they could not have reasonably anticipated to be necessary, or to respond to amendments to the other parties' disclosures.

Dated: July 28, 2023

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Plaintiffs”)*

EXHIBIT A

Exhibit List

Exhibit No.	Doc Date	Description	Beg Bates	End Bates	References
HAUL-MFV 1	6/4/2021	87th Texas Legislative Session: What Happened with Voting Bills	HJ_0003122	HJ_0003123	
HAUL-MFV 2	3/22/2021	ACLU of Texas Letter to Texas Senate State Affairs Committee re Public Hearing on Senate Bill 7	TXLEG_0002272	TXLEG_0002276	
HAUL-MFV 3	3/25/2021	ADL Letter re HB 6, Relating to election integrity and preservation of the purity of the ballot box through prevention of fraud in the conduct of an election; increasing criminal penalties; creating criminal offenses	LUPE_0014916	LUPE_0014918	
HAUL-MFV 4	3/24/2021	ADL Letter re HB 6, Relating to election integrity and preservation of the purity of the ballot box through prevention of fraud in the conduct of an election; increasing criminal penalties; creating criminal offenses	LUPE_0015346	LUPE_0015348	
HAUL-MFV 5	3/26/2021	ADL Letter to Texas Senate State Affairs Committee re SB 7, relating to elections, including election integrity and security; creating a criminal offense; providing civil penalties - OPPOSE	TXLEG_0002286	TXLEG_0002290	
HAUL-MFV 6	3/26/2021	ADL Letter to Texas Senate State Affairs Committee re SB 7, relating to elections, including election integrity and security; creating a criminal offense; providing civil penalties - OPPOSE	LUPE_0015341	LUPE_0015345	
HAUL-MFV 7	4/6/2022	Article: More than 12% of mail-in ballots were rejected in Texas under new GOP voting rules, final tally shows, Houston Chronicle			Exhibit 60 to MSJ Opposition, Document 642-2
HAUL-MFV 8	4/6/2022	Article: Nearly 25,000 mail ballots were rejected in Texas primaries, fueled by confusion over new restrictions, Houston Chronicle			Exhibit 1 to MSJ Opposition, Document 642-2
HAUL-MFV 9		Bexar County Elections Department webpage re voters with disabilities			Exhibit 50 to MSJ Opposition, Document 642-2
HAUL-MFV 10	3/29/2022	Black Ballot Rejection Rates, power point slides			Exhibit 18 to Obakozuwa Deposition
HAUL-MFV 11		Complaint--cancelled curbside voting due to inclement weather	MS014926	MS014926	

Exhibit No.	Doc Date	Description	Beg Bates	End Bates	References
HAUL-MFV 12	3/10/2020	Complaint--describes election judge who had "a real problem with voters with disabilities" who indicated to staff that "we are doing too much for these voters" when helping them vote curbside.	MS015349	MS015349	
HAUL-MFV 13	10/25/2020	Complaint--pollworker describes that people with significant disabilities including one voter who required oxygen had to wait 30 minutes or more to have their absentee ballot cancelled so they could vote curbside	MS015338	MS015338	
HAUL-MFV 14	10/14/2020	Complaint--voter directed to go inside instead of using curbside voting because it would be easier for staff	MS015061	MS015061	
HAUL-MFV 15	10/14/2020	Complaint--waited for curbside voting for 2.5 hours in the parking lot	MS015169	MS015169	
HAUL-MFV 16	8/23/2021	Courtney Pugh's Testimony to the House Constitutional Rights & Remedies Against SB 1	HJ_0000141		
HAUL-MFV 17		Dallas County Elections Department webpage Re Voters with disabilities			Exhibit 48 to MSJ Opposition, Document 642-2
HAUL-MFV 18	8/23/2021	David Weinberg, Brennan Center for Justice, Testimony before the Texas House Select Committee on Constitutional Rights and Remedies on Senate Bill 1	TXLEG_0001791	TXLEG_0001792	
HAUL-MFV 19	4/1/2021	David Weinberg, Brennan Center for Justice, Testimony before the Texas State Affairs Committee	TXLEG_0000797	TXLEG_0000798	
HAUL-MFV 20	7/10/2021	David Weinberg, Brennan Center for Justice, Testimony before the Texas State Affairs Committee on Senate Bill 1	TXLEG_0001135	TXLEG_0001136	
HAUL-MFV 21	3/19/2021	David Weinberg, Brennan Center for Justice, Testimony before the Texas State Affairs Committee on Senate Bill 1509	TXLEG_0001200	TXLEG_0001201	
HAUL-MFV 22	6/21/2023	Declaration of Amy Litzinger			Exhibit 16 to MSJ Opposition, Document 642-2
HAUL-MFV 23	6/18/2023	Declaration of Anne Scott			Exhibit 13 to MSJ Opposition, Document 642-2

Exhibit No.	Doc Date	Description	Beg Bates	End Bates	References
HAUL-MFV 24	6/16/2023	Declaration of Bob Kafka			Exhibit 23 to MSJ Opposition, Document 642-2
HAUL-MFV 25	6/23/2023	Declaration of Dr. Kara Ayers			Exhibit 3 to MSJ Opposition, Document 642-2
HAUL-MFV 26	6/22/2023	Declaration of Heisha Freeman			Exhibit 18 to MSJ Opposition, Document 642-2
HAUL-MFV 27	6/22/2023	Declaration of Jeffrey Clemons			
HAUL-MFV 28	6/20/2023	Declaration of Jennifer Martinez			Exhibit 22 to MSJ Opposition, Document 642-2
HAUL-MFV 29	6/20/2023	Declaration of Jennifer Miller			Exhibit 15 to MSJ Opposition, Document 642-2
HAUL-MFV 30	6/22/2023	Declaration of Jodi Lydia Nunez Landry			Exhibit 20 to MSJ Opposition, Document 642-2
HAUL-MFV 31	5/24/2023	Declaration of Laura Halvorson			Exhibit 21 to MSJ Opposition, Document 642-2
HAUL-MFV 32	6/23/2023	Declaration of Marc Spier			Exhibit 19 to MSJ Opposition, Document 642-2
HAUL-MFV 33	6/21/2023	Declaration of Nancy Crowther			Exhibit 55 to MSJ Opposition, Document 642-2
HAUL-MFV 34	6/18/2023	Declaration of Taylor Scott			Exhibit 14 to MSJ Opposition, Document 642-2
HAUL-MFV 35	5/1/2023	Declaration of Terri Saltzman			Exhibit 10 to MSJ Opposition, Document 642-2
HAUL-MFV 36	6/22/2023	Declaration of Yolanda Ross			Exhibit 17 to MSJ Opposition, Document 642-2
HAUL-MFV 37	5/12/2023	Declaration of Yvonne Iglesias			Exhibit 11 to MSJ Opposition, Document 642-2

Exhibit No.	Doc Date	Description	Beg Bates	End Bates	References
HAUL-MFV 38	5/5/2023	Defendant Harris County Elections Administrator, Clifford Tatum's Amended Responses and Objections to LULAC Plaintiffs' Third Set of Interrogatories			
HAUL-MFV 39	3/21/2023	Defendant Ogg's First Amended Responses to OCA-GH's Second Set of Interrogatories			
HAUL-MFV 40	3/17/2023	Defendant Ogg's Responses to LULAC Plaintiffs' Discovery Requests			
HAUL-MFV 41		Draft info bulletin on SB 1 changes to mail-in voting intended for the public	OCAGH_00001143	OCAGH_00001144	
HAUL-MFV 42		El Paso County Voters with Special Needs webpage re voters with disabilities			Exhibit 52 to MSJ Opposition, Document 642-2
HAUL-MFV 43		Election Assistance Commission – CARES Grant Funding Chart - July 22nd 2020, https://www.eac.gov/sites/default/files/paymentgrants/cares/FundingChart_CARES.pdf (last visited Feb. 10, 2022);			HAUL MTD Opposition, Document 252, FN 2
HAUL-MFV 44	5/26/2021	Email from Anthony Gutierrez to Rep. Briscoe Cain re Letter in opposition to SB7 from voting rights advocacy organizatinos	TXLEG_0000802	TXLEG_0000804	
HAUL-MFV 45	1/17/2022	E-mail from REVUP to advocacy community regarding mail-in-votes rejected with information to help eligible mail ballot voters navigate SB 1	OCAGH_00000549	OCAGH_00000551	
HAUL-MFV 46	3/9/2022	E-mail from REVUP to community advocate making recommendations on SB 1 educational PowerPoint	OCAGH_00000622	OCAGH_0000623	
HAUL-MFV 47		Emily Eby and Joaquin Gonzalez, Opening the Floodgates for Racial Intimidation, Disenfranchisement, and Violence by Expanding Poll Watcher Authority, Texas Civil Rights Project	TXLEG_0001156	TXLEG_0001167	
HAUL-MFV 48		Episode 9 of REVUP podcast	OCAGH_0018311		

Exhibit No.	Doc Date	Description	Beg Bates	End Bates	References
HAUL-MFV 49		Excerpts from Harris County Call Log			Ex. 15 to Colvin Dep
HAUL-MFV 50		Exhibit 2 to Ann Scott Deposition (OCA Greater Houston and HAUL Plaintiffs' Sixth Supplemental Initial Disclosures)			
HAUL-MFV 51		Exhibit 2 to Bob Kafka Declaration (Plaintiffs' OCA Second Amended Complaint)			
HAUL-MFV 52		Exhibit 2 to Catherine Cranston Deposition (Third Supplemental Disclosures)			
HAUL-MFV 53		Exhibit 2 to Daniel Hayes Deposition (SB 1)			
HAUL-MFV 54		Exhibit 2 to Nancy Crowther Deposition (SB 1)			
HAUL-MFV 55		Exhibit 2 to Toby Cole Deposition (SB 1)			
HAUL-MFV 56		Exhibit 2 to Yvonne Iglesias Deposition (OCA Greater Houston and HAUL Plaintiffs' Sixth Supplemental Initial Disclosures)			
HAUL-MFV 57		Exhibit 3 to Catherine Cranston Deposition (Second Supplemental Disclosures)			
HAUL-MFV 58		Exhibit 7 to Catherine Cranston Deposition (SB 1)			
HAUL-MFV 59	2/28/2022	Expert Report by Franita Tolson			
HAUL-MFV 60	4/29/2022	Expert Report of Daniel A. Smith, Ph.D.			
HAUL-MFV 61		Expert Report of Dr. Kara Ayers Regarding the Impact of Senate Bill 1's Revised Oath on Texas Voters with Disabilities			Ecf. Doc. No. 642-4
HAUL-MFV 62	2/28/2022	Expert Report of Professor Douglas L. Kruse, Ph.D.			Ecf. Doc. No. 642-2

Exhibit No.	Doc Date	Description	Beg Bates	End Bates	References
HAUL-MFV 63	11/2/2021	Facebook Post	HJ_0003148	HJ_0003149	
HAUL-MFV 64	9/26/2021	Facebook Post	HJ_0003350	HJ_0003351	
HAUL-MFV 65	7/16/2021	Facebook Post	HJ_0003352	HJ_0003353	
HAUL-MFV 66	10/26/2021	Facebook Post	HJ_0003354	HJ_0003355	
HAUL-MFV 67	12/15/2021	Facebook Post	HJ_0003356	HJ_0003357	
HAUL-MFV 68	9/16/2021	Facebook Post	HJ_0003358	HJ_0003359	
HAUL-MFV 69	9/13/2021	Facebook Post	HJ_0003360	HJ_0003361	
HAUL-MFV 70	5/11/2021	Facebook Post	HJ_0003362	HJ_0003363	
HAUL-MFV 71	7/6/2021	Facebook Post	HJ_0003364	HJ_0003365	
HAUL-MFV 72	5/6/2021	Facebook Post	HJ_0003366	HJ_0003367	
HAUL-MFV 73	9/7/2021	Facebook Post	HJ_0003368	HJ_0003369	
HAUL-MFV 74	9/15/2021	Facebook Post	HJ_0003370	HJ_0003371	
HAUL-MFV 75	4/1/2021	Facebook Post	HJ_0003372	HJ_0003373	
HAUL-MFV 76	8/9/2021	Facebook Post	HJ_0003374	HJ_0003375	
HAUL-MFV 77	5/25/2021	Facebook Post	HJ_0003376	HJ_0003377	

Exhibit No.	Doc Date	Description	Beg Bates	End Bates	References
HAUL-MFV 78	10/18/2021	Facebook Post	HJ_0003378	HJ_0003379	
HAUL-MFV 79	5/5/2021	Facebook Post	HJ_0003380	HJ_0003381	
HAUL-MFV 80	12/13/2021	Facebook Post	HJ_0003382	HJ_0003383	
HAUL-MFV 81	9/7/2021	Facebook Post	HJ_0003146	HJ_0003147	
HAUL-MFV 82		Facebook posts	OCAGH_000183 25	OCAGH_0001833 0	
HAUL-MFV 83		Facebook posts	OCAGH_000183 35		
HAUL-MFV 84		Facebook posts	OCAGH_000183 11		
HAUL-MFV 85		Facebook posts	OCAGH_000183 3		
HAUL-MFV 86		Facebook posts	OCAGH_000185 45	OCAGH_0001854 7	
HAUL-MFV 87		Facebook posts	OCAGH_000184 58		
HAUL-MFV 88		Facebook posts	OCAGH_000183 17		
HAUL-MFV 89	7/1/2022	Form 7-58 Oath of Assistance	STATE110767	STATE110768	Exhibit 19 to Obakozuwa Deposition
HAUL-MFV 90		Grant Summary to Harris County webpage			Exhibit 58 to MSJ Opposition, Document 642-2
HAUL-MFV 91		Harris County Call Log	Tatum_005332		
HAUL-MFV 92		Harris County Carrier Envelope Insert for November 2022 General Election	Tatum_005337	Tatum_005338	Exhibit 13 to Colvin Deposition

Exhibit No.	Doc Date	Description	Beg Bates	End Bates	References
HAUL-MFV 93		Harris County Commissioners Court Video webpage			Exhibit 56 to MSJ Opposition, Document 642-2
HAUL-MFV 94	3/21/2023	Harris County Election Administrator, Clifford Tatum's Supplemental Responses to State Defendants' Second Set of Interrogatories			Exhibit 16 to Colvin Deposition
HAUL-MFV 95		Harris County Elections Administrator's Office webpage			Exhibit 49 to MSJ Opposition, Document 642-2
HAUL-MFV 96		Harris County Sheriff's Office Victim Advocates Award 2019-V3-GX-0134			Exhibit 57 to MSJ Opposition, Document 642-2
HAUL-MFV 97	1/1/2022	Help America Vote Act (HAVA) information page from Texas Secretary of State, dated January 2022			Exhibit 24 to MSJ Opposition, Document 642-2
HAUL-MFV 98	8/27/2020	Help America Vote Act (HAVA) Update, Texas Association of Counties, Legislative Conference			Exhibit 25 to MSJ Opposition, Document 642-2
HAUL-MFV 99		Help America Vote Act (HAVA), Tex. Sec'y of State, John B. Scott, https://www.sos.texas.gov/elections/hava/hava_act.shtml (last visited Feb. 10, 2022)			HAUL MTD Opposition, Document 252, FN 2
HAUL-MFV 100		Hidalgo County Voters with Special Needs webpage			Exhibit 53 to MSJ Opposition, Document 642-2
HAUL-MFV 101	4/29/2021	House Elections Committee Hearing Part 1, Certified Transcript	LUPE 0019015	LUPE 0019029	
HAUL-MFV 102	4/29/2021	House Elections Committee Hearing Part 2, Certified Transcript	LUPE 0019030	LUPE 0016067	
HAUL-MFV 103	4/1/2021	House Elections Committee Hearing, Certified Transcript	LUPE 0018755	LUPE 0018878	
HAUL-MFV 104	4/8/2021	House Elections Committee Hearing, Certified Transcript	LUPE 0018879	LUPE 0018888	
HAUL-MFV 105	8/31/2021	House Floor Debate and Adoption of SB1 CCR, Certified Transcript	LUPE 0022185	LUPE 0022205	

Exhibit No.	Doc Date	Description	Beg Bates	End Bates	References
HAUL-MFV 106	8/27/2021	House Floor Debate and Vote on SB1 (Part 1), Certified Transcript	LUPE_0022206	LUPE_0022280	
HAUL-MFV 107	5/6/2021	House Floor Debate, Certified Transcript	LUPE_0019068	LUPE_0019197	
HAUL-MFV 108	5/6/2021	House Floor Debate, Certified Transcript	HJ_0007740	HJ_0007869	
HAUL-MFV 109	7/10/2021	House Select Committee on Constitutional Rights, Certified Transcript	LUPE_0020099	LUPE_0020986	
HAUL-MFV 110	7/10/2021	House Select Committee on Constitutional Rights, Certified Transcript	HJ_0005503	HJ_0006390	
HAUL-MFV 111		How to Vote in Texas	HJ_0003126	HJ_0003129	
HAUL-MFV 112	2021	Travis County Reports on Federal and State Awards for the Year Ended September 30, 2021			https://financialtransparency.traviscountytx.gov/Reports/SingleAudit/FY2021-SingleAudit.pdf
HAUL-MFV 113	8/14/2020	Resolution of Bexar County Commissioners			https://www.bexar.org/DocumentCenter/View/27840/Bexar-County-SMART-Election-Initiative
HAUL-MFV 114	9/14/2021	Bexar County Adopted Budget Fiscal Year 2021-22			https://www.bexar.org/DocumentCenter/View/32073/Complete-FY-2021-22-Adopted-Budget-20-MB-PDF
HAUL-MFV 115	2022	Bexar County Adopted Budget Fiscal Year 2022-23			https://www.bexar.org/DocumentCenter/View/35912/Complete-FY-2022-23-Adopted-Budget-22-MB-PDF

Exhibit No.	Doc Date	Description	Beg Bates	End Bates	References
HAUL-MFV 116	2021	Dallas County Single Audit Reports for the Year Ended September 30, 2021			https://www.dallascounty.org/Assets/uploads/docs/auditor/SAR/Dallas_County_FY21_Single_Audit_Report_-Final.pdf
HAUL-MFV 117	2023	Dallas County, Texas Single Audit Reports for the Year Ended September 30, 2022			https://www.dallascounty.org/Assets/uploads/docs/auditor/SAR/Dallas_County_Single_Audit_Report_2022_-Final.pdf
HAUL-MFV 118	2021	El Paso County FY 2021 Adopted Budget			https://www.epcounty.com/budget/documents/Adopted%20Books%201%20&%20-%20ONLINE.pdf
HAUL-MFV 119	2022	El Paso County 2022 Adopted Budget			https://www.epcounty.com/budget/documents/FY2022-Adopted-Book_1_2.pdf
HAUL-MFV 120	2022	Travis County Fiscal Year 2022 Adopted Budget			https://www.traviscountytexas.gov/images/planning_budget/Docs/FY_22/FY_2022_Adopted_Budget_Vol_II_Web.pdf
HAUL-MFV 121		Jane's Due Process Opposes SB 7 As an Attack on Voting Rights	TXLEG_0002165	TXLEG_0002165	
HAUL-MFV 122	9/7/2021	Lawsuit Filed Challenging New Texas Law Targeting Voting Rights	HJ_0003130	HJ_0003131	
HAUL-MFV 123	4/1/2021	LDF Letter to House Elections Committee re LDF Opposition to House Bill 6	TXLEG_0000779	TXLEG_0000787	

Exhibit No.	Doc Date	Description	Beg Bates	End Bates	References
HAUL-MFV 124	3/26/2021	LDF Letter to Senate State Affairs Committee re LDF Opposition to Senate Bill 7	TXLEG_0001023	TXLEG_0001033	
HAUL-MFV 125	3/22/2021	LDF Letter to Senate State Affairs Committee re LDF Opposition to Senate Bill 7	TXLEG_0001121		
HAUL-MFV 126	3/25/2021	League of United Latin American Citizens Opposes Voter Supression Legislation	TXLEG_0001216	TXLEG_0001217	
HAUL-MFV 127		Legislative Update	HJ_0000063	HJ_0000080	
HAUL-MFV 128	3/22/2021	Letter from ACLU of Texas, et al. to House Elections Committee	LUPE_0014972	LUPE_0014974	
HAUL-MFV 129	5/11/2021	Letter from Dallas Black Clergy for Safety Equity and Justice, et al. to Governor Abbott, Lieutenant Governor Patrick, Speaker Phelan, and all the Members of the Texas State Legislature	LUPE_0013956	LUPE_0013956	
HAUL-MFV 130		Letter from Devin Branch, Harris County Political Organizer, Texas Organizing Project, re Senate Bill 7	TXLEG_0002441	TXLEG_0002441	
HAUL-MFV 131	3/26/2021	Letter from Georgia Keysor re Senate Bill 7	TXLEG_0002437	TXLEG_0002437	
HAUL-MFV 132	5/5/2021	Letter from Isabel Longoria to Office of Tecas State Representative A. Johnson	Longoria_000368	Longoria_000847	
HAUL-MFV 133	5/14/2020	Letter from Ruth R. Hughs, Texas Secretary of State, to Mona Harrington, Acting Exec. Dir., U.S. Election Assistance Commission, dated May 14, 2020			Exhibit 26 to MSJ Opposition, Document 642-2
HAUL-MFV 134	3/26/2021	Letter from Wesley Story, Progress Texas	TXLEG_0002164	TXLEG_0002164	
HAUL-MFV 135	5/3/2021	Letter in opposition to bills criminalizing voting activities from National and Texas voting rights and criminal justice organizations	LUPE_0004877	LUPE_0004880	
HAUL-MFV 136	8/23/2021	Letter re SB 1, "election integrity" - Opposition Testimony by Public Citizen	TXLEG_0001816	TXLEG_0001819	

Exhibit No.	Doc Date	Description	Beg Bates	End Bates	References
HAUL-MFV 137		Mass media e-mail concerning “ripple effect” of SB 1 on voting, including mail in voting for persons with disabilities	OCAGH_00017226	OCAGH_00017227	
HAUL-MFV 138		Media outreach and inquiries	OCAGH_00000256	OCAGH_00000270	
HAUL-MFV 139		Media outreach and inquiries	OCAGH_00000486		
HAUL-MFV 140		Media outreach and inquiries	OCAGH_00000541	OCAGH_00000548	
HAUL-MFV 141		Media outreach and inquiries	OCAGH_00000557-570	OCAGH_00000570	
HAUL-MFV 142		Media outreach and inquiries	OCAGH_00000652		
HAUL-MFV 143		Media outreach and inquiries	OCAGH_00001216-1220	OCAGH_00001220	
HAUL-MFV 144		Media outreach and inquiries	OCAGH_00000405	OCAGH_00000406	
HAUL-MFV 145		Media outreach and inquiries	OCAGH_00000431-432	OCAGH_00000432	
HAUL-MFV 146		Media outreach and inquiries	OCAGH_00000476	OCAGH_00000477	
HAUL-MFV 147		Media outreach	OCAGH_00018511	OCAGH_00018519	
HAUL-MFV 148		Media outreach	OCAGH_00018504	OCAGH_00018507	
HAUL-MFV 149		Monetary invoices American Sign Language Interpreters for SB 1 education outreach	OCAGH_00000224		
HAUL-MFV 150		Monetary invoices American Sign Language Interpreters for SB 1 education outreach	OCAGH_00000227		
HAUL-MFV 151		Monetary invoices American Sign Language Interpreters for SB 1 education outreach	OCAGH_00000230		

Exhibit No.	Doc Date	Description	Beg Bates	End Bates	References
HAUL-MFV 152		Monetary invoices American Sign Language Interpreters for SB 1 education outreach	OCAGH_00000233		
HAUL-MFV 153		Monetary invoices American Sign Language Interpreters for SB 1 education outreach	OCAGH_00000236		
HAUL-MFV 154		Monetary invoices American Sign Language Interpreters for SB 1 education outreach	OCAGH_00000239		
HAUL-MFV 155		Monetary invoices American Sign Language Interpreters for SB 1 education outreach	OCAGH_00000241		
HAUL-MFV 156		Monetary invoices American Sign Language Interpreters for SB 1 education outreach	OCAGH_00000249		
HAUL-MFV 157		Monetary invoices American Sign Language Interpreters for SB 1 education outreach	OCAGH_00000252		
HAUL-MFV 158		Monetary invoices American Sign Language Interpreters for SB 1 education outreach	OCAGH_00000325		
HAUL-MFV 159		Monetary invoices American Sign Language Interpreters for SB 1 education outreach	OCAGH_00000327		
HAUL-MFV 160		Monetary invoices American Sign Language Interpreters for SB 1 education outreach	OCAGH_00000329		
HAUL-MFV 161		Monetary invoices American Sign Language Interpreters for SB 1 education outreach	OCAGH_00000331		
HAUL-MFV 162		Monetary invoices American Sign Language Interpreters for SB 1 education outreach	OCAGH_00000333		
HAUL-MFV 163		Monetary invoices American Sign Language Interpreters for SB 1 education outreach	OCAGH_00000335		
HAUL-MFV 164		Monetary invoices American Sign Language Interpreters for SB 1 education outreach	OCAGH_00000337		
HAUL-MFV 165		Monetary invoices American Sign Language Interpreters for SB 1 education outreach	OCAGH_00000339		
HAUL-MFV 166		National Disability Voter Registration Week Resources	HJ_0000040	HJ_0000043	

Exhibit No.	Doc Date	Description	Beg Bates	End Bates	References
HAUL-MFV 167	4/6/2021	Press Conference Hosted by Lieutenant Governor Dan Patrick, Certified Transcript	LUPE_0018974	LUPE_0019014	
HAUL-MFV 168		Press release regarding the power of the disability vote in the wake of SB 1	OCAGH_00017273	OCAGH_00017278	
HAUL-MFV 169	8/23/2021	Q's for Courtney Pugh Re: Invited testimony against SB1	HJ_0000139	HJ_0000140	
HAUL-MFV 170	3/30/2021	Re: First Draft Legislative Update	HJ_0000584		
HAUL-MFV 171	4/1/2023	Rep. Bucy comments from April 1, 2023, House Elections Committee Hearing			Exhibit 9 to MSJ Opposition, Document 642-2
HAUL-MFV 172		REVUP Facebook posts	OCAGH_00018344	OCAGH_00018345	
HAUL-MFV 173		REVUP Facebook posts	OCAGH_00018334		
HAUL-MFV 174	7/10/2021	SB 1 Senate Committee on State Affairs, Certified Transcript	LUPE_0021282	LUPE_0022131	
HAUL-MFV 175	8/23/2021	SB1 87th (2nd Special), House Select Committee on Constitutional Rights and Remedies Part 1, Certified Transcript	LUPE_0022778	LUPE_0023131	
HAUL-MFV 176	8/23/2021	SB1 87th (2nd Special), House Select Committee on Constitutional Rights and Remedies Part 1, Certified Transcript	HJ_0006888	HJ_0007241	
HAUL-MFV 177	8/23/2021	SB1 87th (2nd Special), House Select Committee on Constitutional Rights and Remedies Part 2, Certified Transcript	LUPE_0022655	LUPE_0022777	
HAUL-MFV 178	8/23/2021	SB1 87th (2nd Special), House Select Committee on Constitutional Rights and Remedies Part 2, Certified Transcript	HJ_0006765	HJ_0006887	
HAUL-MFV 179	8/26/2021	SB1 House Floor Debate, Certified Transcript	HJ_0006391	HJ_0006764	
HAUL-MFV 180	8/11/2021	SB1 Senate Floor Debate Part 1, Certified Transcript	HJ_0007242	HJ_0007364	

Exhibit No.	Doc Date	Description	Beg Bates	End Bates	References
HAUL-MFV 181	8/11/2021	SB1 Senate Floor Debate Part 2, Certified Transcript	HJ_0007365	HJ_0007444	
HAUL-MFV 182	7/11/2021	Senate Committee on State Affairs Hearing on SB1, Certified Transcript	LUPE_0022132	LUPE_0022184	
HAUL-MFV 183	3/26/2021	Senate Committee on State Affairs, Certified Transcript	LUPE_0019265	LUPE_0020098	
HAUL-MFV 184	8/31/2021	Senate Floor Debate and Adoption of SB1 CCR, Certified Transcript	LUPE_0023132	LUPE_0023262	
HAUL-MFV 185	7/13/2021	Senate Floor Debate on SB1, Certified Transcript	LUPE_0020987	LUPE_0021281	
HAUL-MFV 186	7/13/2021	Senate Floor Debate on SB1, Certified Transcript	HJ_0007445	HJ_0007739	
HAUL-MFV 187	3/31/2021	Senate Floor Debate Part III, Certified Transcript	LUPE_0019198	LUPE_0019242	
HAUL-MFV 188	3/31/2021	Senate Floor Debate Part III, Certified Transcript	HJ_0007870	HJ_0007914	
HAUL-MFV 189	3/22/2021	Senate State Affairs Committee Hearing, Certified Transcript	LUPE_0019243	LUPE_0019264	
HAUL-MFV 190	3/22/2021	Senate State Affairs Committee Hearing, Certified Transcript	HJ_0007915	HJ_0007936	
HAUL-MFV 191	5/5/2023	Signed Verification of Answers to LULAC Plaintiffs' Third Set of Interrogatories and OCA Plaintiffs' First Set of Interrogatories			
HAUL-MFV 192		Supplemental Declaration of Deborah Chen			
HAUL-MFV 193		Supplemental Declaration of Joyce LeBombard			
HAUL-MFV 194	3/1/2022	Survey Bastrop County 2022 Election Inspector Report	State 073122	State 073125	
HAUL-MFV 195	3/1/2022	Survey Blanco County 2022 Election Inspector Report	State073184	State 073187	

Exhibit No.	Doc Date	Description	Beg Bates	End Bates	References
HAUL-MFV 196	3/1/2022	Survey Comal County 3033 Election Inspector Report	State 073278	State 073281	
HAUL-MFV 197	3/3/2022	Survey Guadalupe County Election Inspector Report	State 073432	State 073435	
HAUL-MFV 198	3/3/2022	Survey Dallas County 2022 Election Inspector Report	State 073314	State 073317	
HAUL-MFV 199	3/8/2022	Survey Tom Green County 2022 Election Inspector Report	State 073761	State 073764	
HAUL-MFV 200	3/8/2022	Survey Travis County 2022 Election Inspector Report	State 073801	State 073804	
HAUL-MFV 201	3/2/2022	Survey Brazos County 2022 Election Inspector Report	State 073204	State 073207	
HAUL-MFV 202	3/2/2022	Survey Burnet County 2022 Election Inspector Report	State 073212	State 073215	
HAUL-MFV 203	3/3/2022	Survey El Paso County 2022 Election Inspector Report	State 073336	State 073339	
HAUL-MFV 204	3/2/2022	Survey Fayette County 2022 Election Inspector Report	State 073368	State 073371	
HAUL-MFV 205	3/4/2022	Survey Sugarland County 2022 Election Inspector Report	State 073374	State 073377	
HAUL-MFV 206		Survey Hardin County 2022 Election Inspector Report	State 073440	State 073443	
HAUL-MFV 207		Survey Llano County 2022 Election Inspector Report	State 073565	State 073568	
HAUL-MFV 208	3/7/2022	Survey Travis County 2022 Election Inspector Report	State 073785	State 073788	
HAUL-MFV 209	3/3/2022	Survey Val Verde County 2022 Election Inspector Report	State 073841	State 073844	
HAUL-MFV 210	3/3/2022	Survey Williamson County 2022 Election Inspector Report	State 073885	State 073888	

Exhibit No.	Doc Date	Description	Beg Bates	End Bates	References
HAUL-MFV 211	3/1/2022	Survey Williamson County 2022 Election Inspector Report	State 073889	State 073892	
HAUL-MFV 212	4/18/2022	Harris County Poll Workers Survey about voters with disabilities	20220516	412	
HAUL-MFV 213	3/26/2021	Testimony by Ginger Mayeaux Before the House Elections Committee	HJ_0000017		
HAUL-MFV 214	3/22/2021	Testimony by Ginger Mayeaux Before the Senate State Affairs	HJ_0000027		
HAUL-MFV 215		Testimony from Luis, Every Texan, in Opposition to SB 1: Related to Election Integrity and Security	TXLEG_0004080	TXLEG_0004081	
HAUL-MFV 216	7/10/2021	Testimony of Alex Cogan, LMSW, Manager of Public Policy and Advocacy, The Arc of Texas, Senate State Affairs Committee, Regarding SB 1	TXLEG_0000747	TXLEG_0000748	
HAUL-MFV 217		Testimony of Anne Robinson			Exhibit 8 to MSJ Opposition, Document 642-2
HAUL-MFV 218		Testimony of Maggie Stern, Children's Defense Fund on HB6	TXLEG_0000793	TXLEG_0000796	
HAUL-MFV 219	4/1/2021	Testimony of Nina Perales, MALDEF Vice President of Litigation, on House Bill 6, Texas House Committee on Elections	TXLEG_0000788	TXLEG_0000791	
HAUL-MFV 220	3/26/2021	Testimony of Nina Perales, MALDEF Vice President of Litigation, on Senate Bill 7, Texas Senate Committee on State Affairs	TXLEG_0001040	TXLEG_0001046	
HAUL-MFV 221	7/10/2021	Testimony of Nina Perales, MALDEF Vice President of Litigation, on Senate Bills 1 and 31, Texas Senate Committee on State Affairs	TXLEG_0001137	TXLEG_0001142	
HAUL-MFV 222		Testimony of Patty Ducayet			Exhibit 7 to MSJ Opposition, Document 642-2
HAUL-MFV 223		Testimony of Ruei Tuo, 87th - 1st Special Session - Texas Bill SB1/HB3	TXLEG_0002343	TXLEG_0002343	

Exhibit No.	Doc Date	Description	Beg Bates	End Bates	References
HAUL-MFV 224	3/26/2021	Testimony of Stephanie Gomez on behalf of Common Cause Texas in Opposition to Senate Bill 7	TXLEG_0001036	TXLEG_0001039	
HAUL-MFV 225	7/10/2021	Testimony on SB 1, by Emily Eby, Staff Attorney, Texas Civil Rights Project, Texas Senate State Affairs Committee	TXLEG_0001148	TXLEG_0001155	
HAUL-MFV 226	8/23/2021	Testimony on SB 1, By James Slattery, Senior Staff Attorney, Texas Civil Rights Project, Texas House Select Committee on Constitutional Rights & Remedies	TXLEG_0001793	TXLEG_0001815	
HAUL-MFV 227	3/26/2021	Testimony on SB 7, Proposed Legislation relating to elections, including election integrity and security by Emily Eby, Staff Attorney, Texas Civil Rights Project, before the Texas Senate State Affairs Committee	TXLEG_0001058	TXLEG_0001061	
HAUL-MFV 228	3/26/2021	Testimony on SB 7, Proposed Legislation relating to elections, including election integrity and security; creating criminal offense; providing civil penalties by James Slattery, Senior Staff Attorney, Texas Civil Rights Project, before the Texas Senate State Affairs Committee	TXLEG_0001064	TXLEG_0001065	
HAUL-MFV 229	8/9/2021	Testimony to the Senate Affairs Committee Against SB1, Courtney Pugh, Member of the Arc of Texas	TXLEG_0002408	TXLEG_0002408	
HAUL-MFV 230		Texas Legislative Online History for SB1			Attachment to State Defendants' 11/5/21 Initial Disclosures
HAUL-MFV 231		Texas Legislature Second Special Session: SB 1 Infringes on Voting Rights of Texas with Disabilities	HJ_0003141	HJ_0003142	
HAUL-MFV 232		Texas Legislature Second Special Session: SB 1 Makes it Difficult for Texans with Disabilities to Vote	HJ_0003143	HJ_0003144	

Exhibit No.	Doc Date	Description	Beg Bates	End Bates	References
HAUL-MFV 233		Texas Secretary of State, Help America Vote Act (HAVA) Update, Texas Association of Counties Legislative Conference (Aug. 27, 2020), https://www.sos.texas.gov/elections/forms/hava/HAVAgrant-presentation-TAC-8272020-update.pdf			HAUL MTD Opposition, Document 252, FN 2
HAUL-MFV 234		The Arc of Texas Provides Testimony Against Senate Bill on Elections	HJ_0003139	HJ_0003140	
HAUL-MFV 235	3/25/2021	Transcript of the Testimony of HB6 House Elections Committee	LUPE_0018889	LUPE_0018973	
HAUL-MFV 236		Travis County Voters with Disabilities webpage			Exhibit 51 to MSJ Opposition, Document 642-2
HAUL-MFV 237	10/8/2021	Tweet	HJ_0003384	HJ_0003385	
HAUL-MFV 238	10/26/2021	Tweet	HJ_0003388	HJ_0003390	
HAUL-MFV 239	12/15/2021	Tweet	HJ_0003391	HJ_0003393	
HAUL-MFV 240	9/7/2021	Tweet	HJ_0003394	HJ_0003395	
HAUL-MFV 241	9/8/2021	Tweet	HJ_0003396	HJ_0003397	
HAUL-MFV 242	9/8/2021	Tweet	HJ_0003398		
HAUL-MFV 243	9/9/2021	Tweet	HJ_0003399	HJ_0003400	
HAUL-MFV 244	9/13/2021	Tweet	HJ_0003401		
HAUL-MFV 245	9/15/2021	Tweet	HJ_0003402		
HAUL-MFV 246	10/3/2021	Tweet	HJ_0003403		

Exhibit No.	Doc Date	Description	Beg Bates	End Bates	References
HAUL-MFV 247	9/28/2021	Tweet	HJ_0003404		
HAUL-MFV 248	9/7/2021	Tweet	HJ_0003405	HJ_0003406	
HAUL-MFV 249		Tweet	HJ_0003407	HJ_0003410	
HAUL-MFV 250		Tweet	HJ_0003411	HJ_0003414	
HAUL-MFV 251		Tweet	HJ_0003415	HJ_0003418	
HAUL-MFV 252		Tweet	HJ_0003419	HJ_0003422	
HAUL-MFV 253		Tweet	HJ_0003423	HJ_0003425	
HAUL-MFV 254		Tweet	HJ_0003426	HJ_0003429	
HAUL-MFV 255		Video clip via YouTube: “Disability Voters Mobilize for May Vote & Chilling Laws’ w/ Bob Kafka, Rev-Up TX, KPFT News 3/25/255”	OCAGH_00018248	OCAGH_00018251	
HAUL-MFV 256	4/5/2021	Voting bills make their way through Texas Senate, House	HJ_0003124	HJ_0003125	
HAUL-MFV 257	3/1/2022	State voter letter 6-19			Website: https://www.sos.state.tx.us/elections/forms/pol-sub/6-19.pdf
HAUL-MFV 258	7/1/2022	State voter form 7-58			Website: https://www.sos.state.tx.us/elections/forms/pol-sub/7-58.pdf
HAUL-MFV 259	7/15/2021	Why Did Texas House Democrats (and some Senators) leave Austin? Here's what to know	HJ_0003132	HJ_0003133	
HAUL-MFV 260	4/1/2021	Written Testimony of Jeffrey Clemmons on HB6	TXLEG_0000858	TXLEG_0000859	

Exhibit No.	Doc Date	Description	Beg Bates	End Bates	References
HAUL-MFV 261	8/11/2021	SB1 Senate Floor Debate Part 1, Certified Transcript	LUPE_0023263	LUPE_0023385	
HAUL-MFV 262	8/11/2021	SB1 Senate Floor Debate Part 2, Certified Transcript	LUPE_0023386	LUPE_0023465	
HAUL-MFV 263	8/9/2021	SB1 Senate State Affairs Committee Hearing Part 1, Certified Transcript	LUPE_0023466	LUPE_0023561	
HAUL-MFV 264	8/9/2021	SB1 Senate State Affairs Committee Hearing Part 2, Certified Transcript	LUPE_0023562	LUPE_0023731	
HAUL-MFV 265	4/1/2021	Ex. 6 to Cain Deposition - Testimony in Opposition, Texas Civil Rights Project			
HAUL-MFV 266		Ex. 10 to Cain Deposition - Conference Committee Report Form			
HAUL-MFV 267		Ex. 12 to Cain Deposition - Tweet			
HAUL-MFV 268	1/1/2022	Poll Watcher's Guide, Issued by Secretary of State Elections Division			Ex. 2 to Vera Deposition
HAUL-MFV 269	8/9/2021	Testimony on SB1, by Emily Eby, Staff Attorney, Texas Civil Rights Project, Texas Senate State Affairs Committee	TXLEG_0001186	TXLEG_0001192	
HAUL-MFV 270	8/9/2021	Testimony of Alex Cogan, LMSW, Manager of Public Policy and Advocacy, The Arc of Texas, Senate State Affairs Committee, Regarding SB 1	HJ_0000001	HJ_0000002	
HAUL-MFV 271	7/10/2021	Testimony of Alex Cogan, LMSW, Manager of Public Policy and Advocacy, The Arc of Texas, House Select Committee Constitutional Rights and Remedies, Regarding HB 3	HJ_0000015	HJ_0000016	
HAUL-MFV 272	5/1/2021	Braking the Status Quo: Drive Thru Voting and the 2020 General Election in Harris County	Longoria_000292	Longoria_000330	

Exhibit No.	Doc Date	Description	Beg Bates	End Bates	References
HAUL-MFV 273	5/6/2021	Letters from Isabel Longoria to State Senators Alvarado, Bettencourt, Creighton, Huffman, Kolkhorst, Miles, Taylor, Whitmire re Impacts of Senate Bill 7 and House Bill 6 on Harris County Voters	Longoria_000848	Longoria_000991	
HAUL-MFV 274	5/5/2021	Letters from Isabel Longoria to State Representatives re Impacts of Senate Bill 7 and House Bill 6 on Harris County Voters	Longoria_000368	Longoria_000847	
HAUL-MFV 275		Voting Integrity & Security Collaborative Task Force	Longoria_000992	Longoria_000998	
HAUL-MFV 276		Letter from Anne Robinson, US Army Captain Retired, Paralyzed Veterans of America, to Senator Powell re Disabled Voter Access - SB1 and HB3	TXLEG_00002390	TEXLEG_00002391	
HAUL-MFV 277	1/28/2022	Election Advisory No. 2022-08, Office of the Secretary of State, re NEW LAW: Senate Bill 1 - Opportunity to Correct Defects on an Application for Ballot by Mail and Carrier Envelope	STATE034361	STATE034388	
HAUL-MFV 278		Texas Civil Rights Project testimony on SB 1			Hughes Deposition Ex. 1
HAUL-MFV 279		Letter from Dem Caucus re SB 7			Hughes Deposition Ex. 2
HAUL-MFV 280		Texas Civil Rights Project testimony on SB 7			Hughes Deposition Ex. 4
HAUL-MFV 281		“The False narrative of Vote-by-Mail Fraud,” by the Brennan Center			Hughes Deposition Ex. 5
HAUL-MFV 282	7/1/2021	Letter from TX Association of Election Administrators			Hughes Deposition Ex. 6
HAUL-MFV 283		Testimony re SB 1 by Texas Civil Rights Project			Hughes Deposition Ex. 10
HAUL-MFV 284		Copy of SB 1			Hughes Deposition Ex. 12

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HAUL-MFV 285		Email re poll watcher issue			Murr Deposition Ex. 6
HAUL-MFV 286		Transcript of 7/10/21 hearing			Murr Deposition Ex. 8
HAUL-MFV 287		Transcript of 8/26/21 floor debate			Murr Deposition Ex. 9
HAUL-MFV 288		Transcript of 8/23/21 committee hearing			Murr Deposition Ex. 10
HAUL-MFV 289		Transcript of proceedings in the House			Collier Deposition Ex. 14
HAUL-MFV 290	11/19/2021	Election Advisory No. 2021-21, Office of the Secretary of State, re 2021 Legislative Summary -- Second and Third Special Sessions			
HAUL-MFV 291	4/26/2022	Election Advisory No. 2022-18, Office of the Secretary of State, re Additional Ballot by Mail Procedures for May Uniform Election and Primary Runoff Election			
HAUL-MFV 292	2/11/2022	Election Advisory No. 2022-12, Office of the Secretary of State, re Additional Procedures Regarding Correction of Defects on Application for Ballot by Mail or Carrier Envelope			
HAUL-MFV 293	12/22/2021	Election Advisory No. 2021-24, Office of the Secretary of State, re Informal Application for Ballot by Mail (ABBM)			
HAUL-MFV 294	1/21/2022	Election Advisory No. 2022-07, Office of the Secretary of State, re NEW LAW: Changes to Early Voting by Personal Appearance - House Bill 2025, House Bill 3107, and Senate Bill 1			
HAUL-MFV 295	2/4/2022	Election Advisory No 2022-09, Office of the Secretary of State, re NEW LAW: Changes to Poll Watcher Requirements Under house Bill 3107 and Senate Bill 1			

Exhibit No.	Doc Date	Description	Beg Bates	End Bates	References
HAUL-MFV 296		Application for a Ballot By Mail			Website: https://webservices.sos.state.tx.us/forms/5-15f.pdf
HAUL-MFV 297		Carrier Envelope for ABBM			Website: https://www.sos.state.tx.us/elections/forms/pol-sub/6-15f.pdf
HAUL-MFV 298		Ballot Envelope Form			Website: https://www.sos.state.tx.us/elections/forms/pol-sub/5-21f.pdf
HAUL-MFV 299	2/21/2023	Reviewing ABBMs Presentation			Website: https://www.sos.state.tx.us/elections/forms/reviewing-abbm-02-21-2023.pdf
HAUL-MFV 300	1/28/2022	FAQs for Applications for Ballot By Mail (ABBMs)			Website: https://www.sos.state.tx.us/elections/forms/FAQs-on-ABBMs.pdf
HAUL-MFV 301	2/8/2022	Training for EVBB/SVC Members on new Ballot by Mail Procedures			Website: https://www.sos.state.tx.us/elections/forms/evbb.svc-training-on-new-procedures.pdf
HAUL-MFV 302	9/22/2022	Witnesses, Assistants, and Agents Presentation			Website: https://www.sos.state.tx.us/elections/forms/witness-assistant-and-agent-webinar-9-22-22.pdf
HAUL-MFV 303	11/28/2022	Election Workers and Poll Watchers Webinar			Website: https://www.sos.state.tx.us/elections/forms/election-workers-webinar.pdf

Exhibit No.	Doc Date	Description	Beg Bates	End Bates	References
HAUL-MFV 304	5/1/2022	Article: Jasper Scherer and Zach Despart, "GOP bills target Harris County's efforts to expand voting. Here's how that played out in the 2020 election," Houston Chronicle, May 1, 2021, https://www.houstonchronicle.com/news/houston-texas/houston/article/GOP-bills-target-Harris-County-s-efforts-to-16143213.php .			
HAUL-MFV 305	12/21/2020	Article: Taylor Goldenstein, "Ken Paxton's beefed-up 2020 voter fraud unit closed 16 minor cases, all in Harris County," Houston Chronicle, Dec. 21, 2020, https://www.houstonchronicle.com/politics/texas/article/politics/texas/article/Ken-Paxton-s-beefed-up-2020-voterfraud-unit-15820210.php .			
HAUL-MFV 306	12/17/2021	Article: Taylor Goldenstein, "Texas AG Paxton's \$2.2M voter fraud unit closed three cases in 2021. GOP lawmakers still boosted its budget." Houston Chronicle, Dec. 17, 2021, https://www.houstonchronicle.com/politics/texas/article/Texas-AG-Paxton-s-2-2M-voter-fraud-unit-closed-16708051.php .			
HAUL-MFV 307	4/12/2021	Article: Taylor Goldenstein, "Fact checking Texas lawmaker's claim of 400 voter fraud 'cases,'" Houston Chronicle, April 12, 2021, https://www.houstonchronicle.com/politics/texas/article/Fact-checking-Texas-lawmaker-s-claim-of-400-16095858.php .			

Exhibit No.	Doc Date	Description	Beg Bates	End Bates	References
HAUL-MFV 308	3/24/2021	“Voters of Color Appear to Be Most Frequent Targets of Attorney General Ken Paxton’s Election Integrity Unit,” Press Release, March 24, 2021, https://www.aclutx.org/en/press-releases/voters-color-appear-be-mostfrequent-targets-attorney-general-ken-paxtons-election .			
HAUL-MFV 309		Commonwealth Fund 2020 Scorecard on State Health System Performance, https://www.commonwealthfund.org/publications/scorecard/2020/sep/2020-scorecard-state-health-systemperformance .			
HAUL-MFV 310	5/13/2022	First Expert Report (corrected) by Daniel A. Smith, Ph. D.			
HAUL-MFV 311	6/7/2023	Third Supplemental Expert Report by Daniel A. Smith, Ph.D.			
HAUL-MFV 312	5/22/2023	Reliance materials provided to Expert Daniel A. Smith, Ph.D. for his Third Supplemental Expert Report (6/7/2023)	STATE182524	STATE182536	
HAUL-MFV 313	3/20/2023	Second Supplemental Expert Report of Daniel A. Smith, Ph.D.			
HAUL-MFV 314		Reliance material provided to Expert Daniel A. Smith, Ph.D. for his Second Supplemental Report (3/20/2023) - re: Travis County	GS24000000141	GS24000000141	
HAUL-MFV 315		Reliance material provided to Expert Daniel A. Smith, Ph.D. for his Second Supplemental Expert Report (3/20/2023) - re: Travis County	GS9700000172	GS9700000172	GS9700000172_Nov 2022 election rejected BBM and Reason Codes.xlsx
HAUL-MFV 316		Reliance materials provided to Expert Daniel A. Smith, Ph.D. for his First Supplemental Expert Report (4/29/2022) re: Harris County	Longoria_001077	Longoria_001094	
HAUL-MFV 317		Reliance materials provided to Expert Daniel A. Smith, Ph.D. for his First Supplemental Expert Report (4/29/2022) - re: Harris County	Longoria_001096	Longoria_001100	

Exhibit No.	Doc Date	Description	Beg Bates	End Bates	References
HAUL-MFV 318	4/26/2022	Reliance material provided to Expert Daniel A. Smith, Ph.D. for his First Supplemental Expert Report (4/29/2022) re: Harris County			
HAUL-MFV 319		Reliance materials provided to Expert Daniel A. Smith, Ph.D. for his First Supplemental Expert Report (4/29/2022) - re: Tarrant County			
HAUL-MFV 320		Reliance material provided to Expert Daniel A. Smith, Ph.D. for his First Supplemental Expert Report (4/29/2022) - re: Dallas County	MS015596	MS015596	MS015596 ULTRASENSIT IVE Mail Ballot Files 01012022 - 03102022.xlsx
HAUL-MFV 321		Reliance material provided to Expert Daniel A. Smith, Ph.D. for his First Supplemental Expert Report (4/29/2022) - re: Dallas County	MS015549	MS015549	MS015549 ULTRASENSIT IVE Mail Ballot Files 01012020 - 03122020.xlsx
HAUL-MFV 322		Reliance material provided to Expert Daniel A. Smith, Ph.D. for his First Supplemental Expert Report (4/29/2022) - re: Dallas County	MS015467	MS015467	MS015467 ULTRASENSIT IVE Mail Ballot Files 01012018 - 03152018.xlsx
HAUL-MFV 323	4/26/2022	Reliance material provided to Expert Daniel A. Smith, Ph.D. for his First Supplemental Expert Report (4/29/2022) - re: Dallas County			
HAUL-MFV 324		Reliance materials provided to Expert Daniel A. Smith, Ph.D. for his First Supplemental Expert Report (4/29/2022) - re: Hidalgo County			
HAUL-MFV 325		Reliance material provided to Expert Daniel A. Smith, Ph.D. for his First Supplemental Expert Report (4/29/2022) - re: El Paso County			
HAUL-MFV 326	2/2/2023	Reliance material provided to Expert Daniel A. Smith, Ph.D. for his Second Expert Report (4/22/2023) - re: Harris County	Tatum_005208	Tatum_005208	
HAUL-MFV 327	2/2/2023	Reliance material provided to Expert Daniel A. Smith, Ph.D. for his Second Expert Report (4/22/2023) - re: Harris County	Tatum_005209	Tatum_005262	
HAUL-MFV 328	2/2/2023	Reliance material provided to Expert Daniel A. Smith, Ph.D. for his Second Expert Report (4/22/2023) - re: Harris County	Tatum_005263	Tatum_005264	

Exhibit No.	Doc Date	Description	Beg Bates	End Bates	References
HAUL-MFV 329		Reliance material provided to Expert Daniel A. Smith, Ph.D. for his Second Expert Report (4/22/2023) - re: statewide			
HAUL-MFV 330		Reliance material provided to Expert Daniel A. Smith, Ph.D. for his First Expert Report (4/22/2023)			
HAUL-MFV 331		Reliance material provided to Expert Daniel A. Smith, Ph.D. for each of his reports			
HAUL-MFV 332	2/28/2022	Expert Report of J. Morgan Kousser, Ph.D.			
HAUL-MFV 333	2/28/2022	Eric McDaniel Expert Witness report			
HAUL-MFV 334	2/28/2022 McDaniel report	Figure One: Racial differences in voting methods given age			
HAUL-MFV 335	2/28/2022 McDaniel report	Figure Two: Predicted probability of using a voting method, given race and age in 2020 election			
HAUL-MFV 336	2/28/2022 McDaniel report	Figure Three: Predicted probability of using a voting method, given race and age in 2016 election			
HAUL-MFV 337	2/28/2022 McDaniel report	Figure Four: Wait times for in-person voting by race and voting method			
HAUL-MFV 338	2/28/2022 McDaniel report	Figure Five: Predicted probability of reported wait time given race and voting method			
HAUL-MFV 339	2/28/2022 McDaniel report	Figure Seven: Racial differences in ballot drop location			
HAUL-MFV 340	2/28/2022 McDaniel report	Figure Eight: Wait time for in-person voting by county size			
HAUL-MFV 341	2/28/2022 McDaniel report	Table One: percentage of state population by in counties by county size and race			
HAUL-MFV 342	2/28/2022 McDaniel report	Figure Nine: Reported incidents of voter intimidation given a county's history of lynching and President Trump's margin of victory			
HAUL-MFV 343	4/29/2022	Eric McDaniel Supplemental Expert Witness Report			

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HAUL-MFV 344	4/29/2022 McDaniel supp. report	Figure One: Texas voter turnout 2000-2020 by race			
HAUL-MFV 345	2/10/2023	Eric McDaniel Supplemental Expert Witness Report			
HAUL-MFV 346	2/10/2023 McDaniel supp. report	Figure One: Average change in county level in-person and mail early voting 2016-2022			
HAUL-MFV 347	2/28/2022	Expert Report of Christian Grose			
HAUL-MFV 348	2/28/2022 Grose report	Table 4: The empirical racial impact of banning 24-hour early voting in Texas			
HAUL-MFV 349	2/28/2022 Grose report	Table 5 (page 19): Average share of the vote-by-mail electorate across Texas counties			
HAUL-MFV 350	4/25/2022	Rebuttal expert report of Dr. Christian Grose			
HAUL-MFV 351	4/25/2022 Grose rebuttal report	Table 2: Total number of early voting locations with 24-hour voting in each county in the 2020 general election			
HAUL-MFV 352	4/25/2022 Grose rebuttal report	Table 3: Number of early voting locations restricted by SB1 prohibition on Sunday voting before 9 am			
HAUL-MFV 353	2/10/2023	Christian Grose Supplemental Expert Report			
HAUL-MFV 354	2/10/2023 Grose report	Table (page 5): Average share of the vote-by-mail electorate across Texas counties			
HAUL-MFV 355	2/10/2023 Grose report	Table (page 6): Size of eligible Latino population/decline in Latino average share of vote by mail			
HAUL-MFV 356		The empirical impact of SB1 on voters of color			
HAUL-MFV 357	2022	2022 Hotline Responses excel	MFV000085	MFV000085	
HAUL-MFV 358	2022	General Voter Education 2022 (MFV Texas Team)	MFV000086	MFV000106	

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HAUL-MFV 359	2/18/2022	Texas Civil Rights Project - SB 1 Summary (external)(rev. 02.18.22)	MFV000109	MFV000132	
HAUL-MFV 360	11/21/2021	SB1-Provisions	MFV000133	MFV000134	
HAUL-MFV 361	Dec-21	Texas Civil Rights Project Presentation on VR Changes by James Slattery	MFV000135	MFV000152	
HAUL-MFV 362	2022	Mi Familia Vota – Toolkit – Texas Lets Get Ready for Early Vote	MFV000153	MFV000159	
HAUL-MFV 363	2022	Training Updated 2022 TX Voter Education Hotline Volunteer Training PowerPoint	MFV000160	MFV000226	
HAUL-MFV 364	7/18/2018	Email from Elections Internet To: Redacted Subject: Election Security	MFV007551	MFV007553	
HAUL-MFV 365	7/19/2018	Email from Steven Strominger To: Secretary Subject: Election security	MFV007554	MFV007556	
HAUL-MFV 366	7/18/2018	Email from Elections Internet To: Redacted Subject: Re: Election Security	MFV007557	MFV007559	
HAUL-MFV 367	2/13/2019	Email from Sam Taylor To: Jacqueline Benton Subject: RE: Question regarding Secretary of State's cybersecurity	MFV007560	MFV007596	
HAUL-MFV 368	12/3/2020	Email from Elections Internet To: Redacted Subject: FW: Web Mail Correspondence	MFV007597	MFV007598	
HAUL-MFV 369	3/21/2017	Email from Evans Carrlyn To: Gneral@gregabbott.com; ken.paxton@oag.texas.gov; Secretary Subject Important correspondence from NAACP President	MFV007599	MFV007605	
HAUL-MFV 370	10/4/2020	Email from Heidi Martinez To: Redacted Subject: Integrity of our elections (EI Response)	MFV007606	MFV007607	
HAUL-MFV 371	12/30/2019	Email from Heidi Martinez To: Redacted Subject: Ms. Diana Pattillo (EI)	MFV007608	MFV007610	
HAUL-MFV 372	8/11/2020	Email from Charles Pinney To: Redacted Subject: Re" Illegal or just inappropriate? (EI Response)	MFV007611	MFV007612	

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HAUL-MFV 373	7/26/2019	Email from Stephen Chang To: Phillip Prazan Subject: RE" KXAN media request	MFV007630	MFV007631	
HAUL-MFV 374	2/4/2019	Email from Elections Internet To: Christina Adkins Subject: FW: The list of non-citizens	MFV007634	MFV007634	
HAUL-MFV 375	2/5/2019	Email from Elections Internet To: Christina Adkins Subject: FW: Vote Fraud Advisory	MFV007635	MFV007635	
HAUL-MFV 376	2/13/2019	Email from Elections Internet To: Christina Adkins Subject: FW: Voter fraud list	MFV007636	MFV007636	
HAUL-MFV 377	10/25/2022	Email from James Slattery To: James Slattery Subject: FWD: Press Release: Civil Rights Groups Call for federal watchdogs after secretary of State undermines Harris County midterm election	MFV011971	MFV011974	
HAUL-MFV 378		Application for a Ballot by Mail – Ingram April 26, 2022, Depo Ex. 6	STATE031879	STATE031880	
HAUL-MFV 379		Carrier Envelope for Early Voting Ballot – Ingram April 26, 2022, Depo Ex. 7 -	STATE032017	STATE032019	
HAUL-MFV 380		Official Election Signature Sheet for an FPCA Voter – Ingram April 26, 2022, Depo Ex. 8	STATE040053	STATE040054	
HAUL-MFV 381		Notice of Rejected Application for Ballot by Mail – Ingram April 26, 2022, Depo Ex. 9	STATE031645	STATE031646	
HAUL-MFV 382		Notice of Rejected Application for Ballot by Mail – Ingram April 26, 2022, Depo Ex. 10	STATE031643	STATE031644	
HAUL-MFV 383		Texas Secretary of State – FAQs on Applications for Ballot by Mail (ABBMs) – Ingram April 26, 2022, Depo Ex. 11	STATE001713	STATE001743	
HAUL-MFV 384	1/28/2022	Election Advisory No. 2022-08 From: Keith Ingram To: Election Officials	STATE019849	STATE019876	
HAUL-MFV 385		Oath of Assistance – Ingram April 28, 2022 Depo Ex. 02	STATE001652	STATE001653	
HAUL-MFV 386		Oath of Assistance and Interpreter Statement of Purpose	STATE001651	STATE001651	

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HAUL-MFV 387		Texas Secretary of State, Elections Division, Webinar	STATE087078	STATE087104	
HAUL-MFV 388	11/30/2020	Secretary Hughs Press Release, Ingram 4/26/2022 Depo. Ex. 22			
HAUL-MFV 389	4/7/2022	Email from Keith Ingram to Justin Williamson re county by county mail ballot numbers, Ingram 5/6/2022 Depo. Ex. 4	STATE087299	STATE087305	

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was served on July 28, 2023 upon all counsel of record by CM/ECF:

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Jennifer A. Holmes